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VIA ECF

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601
(Gina_Sicora@nysd.uscourts.gov)

March 18, 2020

Re: United States v. Helbrans
19-CR-497 (NSR)

Dear Judge Román:

I represent Jacob Rosner. I write to request a one-month extension of time to file Defendants' pretrial motions – currently due on March 20, 2020 – with a corresponding adjustment of the dates for filing the government's response and the defendants' replies. The proposed schedule is as follows:

April 20, 2020 – defense motions
June 5, 2020 – government response
June 19, 2020 – defense replies

A principal reason for the request is that counsel are experiencing dislocations to our practices and families resulting from the COVID-19 epidemic, and need additional time to adjust to these dislocations. Additionally, I recently appeared for Jacob Rosner, and would benefit from additional time to review the discovery before having to file motions. Some additional aspects of my schedule that make the current deadlines difficult are as follows: in spite of the COVID-19 pandemic, I am currently involved, remotely, in a trial that is ongoing in the United Kingdom, and I have a Second Circuit argument tomorrow that will proceed as scheduled.

All co-counsel either join or do not object. The government has not yet responded to my inquiry regarding their position but am filing this letter now given the proximity of the existing deadline.

Respectfully,
/s/ Alan S. Lewis
Alan S. Lewis

ASL:bp

VIA ECF

All Counsel of Record

9395462.2

Motion briefing schedule for Dfts. Helbrans (01), M. Rosner (02), A. Rosner (03), J. Rosner (04), M. M. Malka (05) & M. Malka (09) is extended as set forth below. Clerk of the Court requested to terminate the motion (doc. 74).

Dated: March 18, 2020

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Status Conf. adjourned from June 24, 2020 until July 24, 2020 at 10:30 am.

MEMO ENDORSED

USDC SDNY
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